

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

In re: Karen Little Young, Debtor

)  
)

Case No. 16-33413-KLP  
Chapter 13

**NOTICE OF HEARING AND OBJECTION TO CONFIRMATION**

COMES NOW the Chapter 13 Trustee, Suzanne E. Wade, and moves this Court to deny confirmation of the plan filed August 8, 2016, for the cause as follows:

1. The Debtor filed this Chapter 13 Petition, now pending in the United States Bankruptcy Court, Eastern District of Virginia, Richmond Division, on July 11, 2016 under 11 U.S.C. Chapter 13.
2. This Objection is filed pursuant to 11 U.S.C. § 1325.
3. The above-filed Chapter 13 case is not eligible for confirmation due to the Debtor's failure to provide proof of filing all required tax returns pursuant to 11 U.S.C. §1308 and §1325(a)(9). The Trustee requests the Debtor forward copies of her state and federal individual income tax returns for the 2014 and 2015 tax years.
4. The Debtor has failed to provide evidence of her income described in Form 122C-1. The Trustee requests the Debtor forward copies of her paystubs from January 1, 2016 to the present as necessary to support the income described in her Statements and Schedules.
5. The Debtor's Schedule J indicates that the Debtor makes a monthly charitable contribution of \$380.00. The Trustee requests the Debtor provide documentation to support this contribution.
6. The Trustee requests the Debtor provide a copy of the deed for real property located at 2247 Rose Mount Road, Hustle, VA 22476. In addition, the Trustee request the Debtor provide a current market analysis for real property located at 1229 Laurel Springs Road, Hustle, VA 22476 and real

**Suzanne E. Wade, Chapter 13 Trustee**  
Virginia State Bar Number 31868  
1313 East Main Street, Suite A  
Post Office Box 1780  
Richmond, Virginia 23218-1780  
(804) 775-0979

property located at 2247 Rose Mount Road, Hustle, VA 22476.

7. The Debtor's Schedules indicate the Debtor's monthly income is negative \$4,182.69 and therefore cannot support any Plan payments.
8. The Debtor's Plan is incomplete and does not indicate how creditors are to be treated.

WHEREFORE, for the reasons stated herein, the Chapter 13 Trustee respectfully moves the Court to deny confirmation of the Debtor's proposed Chapter 13 Plan, and for such further and other relief as the Court deems necessary.

**Notice is hereby given, pursuant to Local Rule 3015(E)(2), that a hearing on this motion will be held at United States Bankruptcy Court, 701 East Broad Street, Room 5100, Richmond, Virginia, 23219, on August 31, 2016 at 9:10 A.M.**

Date: August 24, 2016

/s/ Suzanne E. Wade  
Chapter 13 Trustee

Document Page 3 of 5  
**CERTIFICATE OF SERVICE**

I hereby certify a true copy of the foregoing NOTICE OF HEARING AND OBJECTION TO CONFIRMATION was served by first-class mail, postage prepaid, this 24th day of August, 2016, upon the Debtor, Karen Little Young, PRO SE Debtor, at 1229 Laurel Springs Rd., Hustle, VA 22476 .

/s/ Suzanne E. Wade  
Chapter 13 Trustee

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

In re: Karen Little Young, Debtor

1229 Laurel Springs Rd.

Hustle, VA 22476

XXX-XX-7202

)  
)  
)  
)  
)  
)

Case No. 16-33413-KLP

Chapter 13

**NOTICE OF OBJECTION TO CONFIRMATION**

Suzanne E. Wade, Chapter 13 Trustee, has filed papers with the Court objecting to the confirmation of your Chapter 13 Plan filed August 8, 2016.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

If you do not want the Court to grant the relief sought in the Objection, or if you want the Court to consider your views on the Objection, then on or before three (3) days before the date of the hearing, you or your attorney must:

File with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response to the Court for filing, you must mail it early enough that the Court will **receive** it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street, Suite 4000  
Richmond, Virginia 23219

You must also mail a copy to:

Suzanne E. Wade, Chapter 13 Trustee  
Post Office Box 1780  
Richmond, Virginia 23218-1780

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Objection, and may enter an order granting that relief.

Date: August 24, 2016

/s/ Suzanne E. Wade  
Chapter 13 Trustee

**Suzanne E. Wade, Chapter 13 Trustee**  
Virginia State Bar Number 31868  
1313 East Main Street, Suite A  
Post Office Box 1780  
Richmond, Virginia 23218-1780  
(804) 775-0979

Document Page 5 of 5  
**CERTIFICATE OF SERVICE**

I hereby certify a true copy of the foregoing NOTICE OF OBJECTION TO CONFIRMATION was served by first-class mail, postage prepaid, this 24th day of August, 2016, upon the Debtor, Karen Little Young, PRO SE Debtor, at 1229 Laurel Springs Rd., Hustle, VA 22476 .

/s/ Suzanne E. Wade  
Chapter 13 Trustee